	Case 3:16-cv-00144-MMD-VPC Dod	cument 50 Filed 12/07/16	Page 1 of 7
1 2 3 4 5 6 7	NATHAN M. JENKINS (560) JENKINS LAW FIRM 1895 Plumas Street, Suite 2 Reno, NV 89509 (775) 829-7800 Attorneys for Defendant Northern Neva Engineers Health and Welfare Trust	ada Operating	
9	GOLIGHTLY & VANNAH, PLLC,	Case No. 3	:16-cv-00144-MMD-VPC
JENKINS LAW FIRM  ATTORNEYS AT LAW  1895 Plumas Street, Suite 2  Reno, Nevada 89509  775) 829-7800 Fax (775) 829-0511  52  53  54  55  56  57  58  58  58  58  59  50  50  50  50  50  50  50  50  50	Plaintiff,		
	VS.  HAL HAMLETT, an individual; JESSI HAMLETT, an individual; JAIDYN HAMLETT, a minor; JONATHAN HO a minor; REGIONAL EMERGENCY MEDICAL SERVICE AUTHORITY; CHRISTIAN PURGASON, D.O. dba NORTHERN NEVADA EMERGENCY PHYSICIANS; TJ ALLEN, LLC; REN REGIONAL MEDICAL CENTER; RE ORTHOPAEDIC CLINIC, LTD., DR. CHRISTENSEN; RENO RADIOLOGI ASSOCIATES, CHARTERED; ROBE BERRY, JR., M.D. PROFESSIONAL CORPORATION dba ORTHOPEDIC REHABILITATION SPECIALISTS OF UNIVERSAL SERVICES, INC.; OPER ENGINEERS FUNDS, INC. dba OPER ENGINEERS HEALTH & WELFARE FUND; DOE Defendants I through X; I CORPORATION Defendants XI through Defendant.	INTERPLA DEFENDA AND JAID OLLAND,  Y IOWN ENO ECAL RT G. F NV; RATING RATING TRUST ROE	OTION TO DISBURSE EADER FUNDS AS TO ANTS HAL HAMLETT OYN HAMLETT
		/	
24	COMES NOW, Plaintiff Golightly & Vannah, Defendants Northern Nevada Operating		
25	Engineers Health & Welfare Trust Fund	•	
26	Engineers Funds, Inc. dba Operating Engineers Health & Welfare Trust Fund ("Defendant Trust Fund"), by and through their undersigned counsel, TJ Allen, LLC, in pro per, and Hal Hamlett, in		
27 28	pro per for himself and his minor child		

## Case 3:16-cv-00144-MMD-VPC Document 50 Filed 12/07/16 Page 2 of 7

	- 1	A	
	1	enter an Order disbursing interpleader funds as to Defendants Hal Hamlett and his minor child	
	2	Jaidyn Hamlett. This joint motion is made and stipulated to by Plaintiff Golightly & Vannah,	
	3	PLLC, and Defendants Hal Hamlett, in pro per for himself and his minor child Jaidyn Hamlett,	
	4	TJ Allen, LLC, in pro per, and Northern Nevada Operating Engineers Health & Welfare Trust	
	5	Fund, named in the Complaint in Interpleader as Operating Engineers Funds, Inc. dba Operating	
	6	Engineers Health & Welfare Trust Fund, by and through its undersigned counsel, pursuant to	
	7	Federal Rule of Civil Procedure 22, the accompanying memorandum of Points and Authorities,	
8	any exhibits attached thereto, the pleadings and documents on file herein, and any oral argument		
	at a hearing on this matter.		
	10	There is a separate motion pending to disburse interpleader funds as to Jessica Hamlett	
	11	(ECF No. 43).	
ATTORNEYS AT LAW 1895 Plumas Street, Suite 2 Reno, Nevada 89509 (775) 829-7800 Fax (775) 829-0511 8 1 2 9 5 5 7 7 7 5 829-0511	12	DATED this day of December, 2016.	
	13	JENKINS LAW FIRM Attorneys for Defendant Northern Nevada Operating	
	14	Engineers Health and Welfare Trust Fund	
	16	By: NATHAN M. JENKINS	
	17	1895 Plumas Street, Suite 2 Reno, NV 89509	
	18		
	19	DATED this 7 <sup>th</sup> day of December, 2016.	
20 21	20	GOLIGHTLY & VANNAH, PLLC Attorneys for Plaintiff	
	22	By: /s/ L. DiPaul Marrero  ROBERT D. VANNAH (NV Bar 2503)	
	23	L. DIPAUL MARRERO II (NV Bar 12441) 5555 Kietzke Lane, Suite 150	
24 25	Reno, NV 89511		
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27			
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JENKINS LAW FIRM

	Case 3:16-cv-00144-MMD-VPC Document 50 Filed 12/07/16 Page 3 of 7
1	DATED this 7 <sup>th</sup> day of December, 2016.
2 3	DEFENDANT TJ ALLEN, LLC, in pro per
	By:/s/TJ Allen
4	TJ ALLEN, LLC 1475 Terminal Way, Suite A4
5	Reno, NV 89502 775-770-2225
6 7	
	DATED this 7 <sup>th</sup> day of December, 2016.
8	DEFENDANT HAL HAMLETT, in pro per
9	By: /s/ Hal Hamlett
10	HAL HAMLETT 17185 Aquamarine Drive
11	Reno, NV 89508
= 12	DATED this 7 <sup>th</sup> day of December, 2016.
RM uite 2 09 829-0511	DEFENDANT HAL HAMLETT on behalf of his minor
ENKINS LAW FIRM ATTORNEYS AT LAW 95 Plumas Street, Suite Reno, Nevada 89509 29-7800 Fax (775) 829	child JAIDYN HAMLETT, in pro per
S LA NEYS A as Str levada Fax	By: /s/ Hal Hamlett
ATTORNEY S95 Plumas Reno, Nev. Reno, Nev. R29-7800 F2	HAL HAMLETT 17185 Aquamarine Drive
1895 128 29 128 29	Reno, NV 89508
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## JENKINS LAW FIRM

12 (775) 829-7800 Fax (775) 829-0511 ATTORNEYS AT LAW
1895 Plumas Street, Suite 2 13 14 15 16 17 18

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## MEMORANDUM OF POINTS AND AUTHORITIES

On August 2, 2013, Defendants Hal Hamlett, Jessica Hamlett and their minor child Jaidyn Hamlett were injured in an automobile accident. Plaintiff, Golightly&Vannah represented them in their personal injury claims. Golightly & Vannah settled Hal and Jaidyn's personal injury claims as follows:

> Hal Hamlett \$ 11,944.00 Jaidyn Hamlett \$ 656.00

Thereafter, Golightly & Vannah commenced this interpleader action on February 3, 2016 and interplead the above-listed personal injury settlements. The only parties to this interpleader action claiming an interest in the interpleader funds from the personal injury settlement on behalf of Hal Hamlett and Jaidyn Hamlett are: (1) Hal Hamlett, (2) Jaidyn Hamlett, (3) TJ Allen, and (4) Defendant Trust Fund (collectively, "Hal and Jaidyn Interpleader Claimants"). All other interpleader defendants have failed to appear and been defaulted, or disclaimed interest. The Hal and Jaidyn Interpleader Claimants have filed a Notice of Settlement all their interpleader claims (ECF No. 48). There is a separate motion pending to disburse interpleader funds as to Jessica Hamlett (ECF No. 43).

The Hal and Jaidyn Interpleader Claimants stipulate, agree, and move the Court to disburse the interpleader funds from the personal injury settlement on behalf of Hal Hamlett and Jaidyn and Jaidyn Hamlett as follows:

## HAL HAMLETT INTERPLEADER FUNDS

Hal Hamlett	\$ 1,500.00
Golightly & Vannah	1,118.56
TJ Allen	250.00
Defendant Trust Fund	9,075.44
TOTAL	\$ 11,944.00
JAIDYN HAMLETT INTERPL	EADER FUNDS
Jaidyn Hamlett	\$ 250.00
Golightly & Vannah	59.62

1	TJ Allen 0.00
2	Defendant Trust Fund <u>346.38</u>
3	TOTAL \$ 656.00
4	The above listed disbursement of interpleader funds is fair and equitable. The personal
5	injury recoveries of Hal Hamlett and Jaidyn Hamlett are insufficient to pay their attorneys and
6	costs and medical bills. Consequently, the Hal and Jaidyn Interpleader Claimants have all agreed
7	to the foregoing distribution as fair an equitable. Therefore, the Hal and Jaidyn Interpleader
8	Claimants respectfully request the Court enter an order distributing the Hal Hamlett interpleader
9	funds (\$11,944.00) and the Jaidyn Hamlet interpleader funds (\$656.00) as set forth above.
MM uite 2 09 13 12 12 12 10 10 10 10 10 10 10 10 10 10 10 10 10	DATED this day of December, 2016.
	JENKINS LAW FIRM
	Attorneys for Defendant Northern Nevada Operating Engineers Health and Welfare Trust Fund
E \$ 866 14	By: Laber
CI a a s	1895 Plumas Street, Suite 2
HENKINS ATTORNE 895 Plumas Reno, Nev 829-7800 I	Reno, NV 89509
JENKIN's ATTOR 1895 Plum. Reno, N 829-7800	DATED this 7 <sup>th</sup> day of December, 2016.
19 20 21 22 23 24 25 26	GOLIGHTLY & VANNAH, PLLC
	Attorneys for Plaintiff
	By: /s/ L. DiPaul Marrero
	ROBERT D. VANNAH (NV Bar 2503) L. DIPAUL MARRERO II (NV Bar 12441)
	5555 Kietzke Lane, Suite 150 Reno, NV 89511
	DATED 1: 7th 1 - CD 1 - 2016
	DATED this 7 <sup>th</sup> day of December, 2016.
	DEFENDANT TJ ALLEN, LLC, in pro per
	By: /s/TJ Allen
27	TJ ALLEN, LLC 1475 Terminal Way, Suite A4
28	Reno, NV 89502 775-770-2225

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	Case 3:16-cv-00144-MMD-VPC Document 50 Filed 12/07/16 Page 6 of 7
1	DATED this 7th day of December 2016
2 3 4 5 6 7 8	DATED this 7 <sup>th</sup> day of December, 2016.
	DEFENDANT HAL HAMLETT, in pro per
	By: <u>/s/ Hal Hamlett</u> HAL HAMLETT
	HAL HAMLETT 17185 Aquamarine Drive Reno, NV 89508
	Reno, NV 89508
	DATED this 7 <sup>th</sup> day of December, 2016.
	DEFENDANT HAL HAMLETT on behalf of his minor child JAIDYN HAMLETT, in pro per
9	
10	By: <u>/s/ Hal Hamlett</u> HAL HAMLETT
11	17185 Aquamarine Drive Reno, NV 89508
= 12	Tello, IVV 02200
FIRM Aw Suite 2 9509 5) 829-0511	
N FIR LAW eet, Su 8950 775) 8	
ATTORNEYS AT LAW FI Plumas Street, S no, Nevada 895 7800 Fax (775)	
ENKINS LAW FIRM ATTORNEYS AT LAW 195 Plumas Street, Suite Reno, Nevada 89509 229-7800 Fax (775) 829 L 9 1 1	
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CERTIFICATE OF SERVICE 1 I certify that I am an employee of JENKINS LAW FIRM and that on this date the within 2 document entitled JOINT MOTION TO DISBURSE INTERPLEADER FUNDS AS TO 3 **DEFENDANTS HAL HAMLETT AND JAIDYN HAMLETT** was electronically filed with 4 the Clerk of the Court using the CM/ECF system, which will automatically e-serve the same on 5 the attorney of record set forth below: Robert D. Vannah, Esq., L. Dipaul Marrero II, Esq. Golightly & Vannah, PLLC 8 5555 Kietzke Lane, Suite 150 Reno, NV 89511 Attorneys for Plaintiff 10 Mark J. Bourassa, Esq. Trent L. Richards, Esq. 11 The Bourassa Law Group, LLC 8668 Spring Mountain Road, Suite 101 12 (775) 829-7800 Fax (775) 829-0511 Las Vegas, NV 89117 Attorneys for Defendant Universal Services, Inc. 13 ATTORNEYS AT LAW 1895 Plumas Street, Suite 2 JENKINS LAW FIRM and that on this date I deposited for mailing at Reno, Nevada a true copy of the within document 14 addressed to: 15 Jessica Hamlett 16 17185 Aquamarine Drive Reno, NV 89508 17 TJ Allen, LLC 18 1475 Terminal Way, Suite A4 Reno, NV 89502 19 20 DATED this \_\_\_\_\_ day of December, 2016, 21 Outie Ferry 22 23 24 25 26 27 28